UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MORAN INDUSTRIES, INC.,)
Plaintiff,)
v.) No. 07 CV 6092
JAMES C. HIGDON, CHRISTIAN) Judge Guzman
HIGDON, KAREN HIGDON, URICK)
THAMELING, HIGDON & HIGDON,)
INC., THAMELING & HIGDON, LLC,)
and MASTERS TRANSMISSION &)
AUTO REPAIR, INC.,)
Defendants.)

JOINT INITIAL STATUS REPORT

Pursuant to the Honorable Judge Ronald A. Guzman's Case Management Procedures for Initial Appearances, the parties submit this Joint Initial Status Report.

- 1. The parties have agreed to exchange the pre-discovery disclosures required by Fed. R. Civ. P. 26(a)(1) on or before February 1, 2008.
- 2. Based on the recently filed dispositive motions by defendants, the parties agree that limited and expedited jurisdictional discovery is appropriate. Plaintiff proposes that defendants shall respond to interrogatories and document requests related to jurisdictional issues within 14 days of service and that defendants shall appear for depositions limited to jurisdictional issues on or before February 22, 2008. Defendants do not agree to the expedited time period proposed by plaintiff for the responses to the written discovery related to jurisdictional issues.

Dated: January 8, 2008 Respectfully submitted,

s/ Andrew P. Bleiman

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CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2008, I electronically filed the Joint Initial Status Report using the $\mathbf{CM/ECF}$ system.

s/ Andrew P. Bleiman